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Anna Hinton, Ph.D.
Director, Parental Options and Information
US Department of Education, OII
400 Maryland Avenue S.W., Rm. 4W221, LBJ Building
Washington, DC 20202-5970

Dear Dr. Hinton:

We received your letter regarding Wake County Public School district's application for the 2010 Magnet Schools Assistance Program (MSAP), CFDA 84.165A. We appreciate receiving the feedback provided by the three reviewers, since this information will be used as part of our continuous improvement process for future grant application submissions.

After carefully studying the feedback, we have questions about some of the comments that were provided. Specifically, the comments from Reader #3 gave us pause as they were significantly different from those of the other two readers. There are three areas for concern that arise from our reading of Reader 3's comments: 1) an inordinate focus on issues of gender; 2) factual errors; and 3) assumptions Reader 3 seems to have made concerning our diversity of personnel.

1. Inordinate Focus on Issues of Gender

Reader #3 states in the feedback from Quality of Project Services that "*The school district does not clearly and adequately address gender differences based on race when speaking about services*" Some variance of this concern is also cited in feedback on Evaluation Plan, Commitment & Capacity, Quality of Project Design, and Selection of Students. Those sections received point deductions directly and specifically in response to Reader #3's concerns with issues of gender.

The purpose of the grant is to reduce minority group isolation with minority groups defined by racial/ethnic categories (e.g., American Indian/Alaskan Native, Asian or Pacific Islander, Black, or Hispanic). In fact, Reader #3 states in the comments for Quality of Project Design that, "race is too much of a factor." While Reader 3 is, of course, entitled to his/her opinion about whether race is over-emphasized in the MSAP, it seems inappropriate for him/her to substitute personal preferences for the stated guidelines of the competition. These reviewer comments and deductions are contradictory to the purposes of MSAP as it appears this reviewer has confused issues of gender with the purposes of this grant. Were all Readers systematically trained to review applications for issues of gender or did Reader #3 systematically deduct points from all applications he/she reviewed for issues of gender? If the answer is "no" to either of the preceding conditions, our final score and subsequent award status were negatively and unfairly impacted by a single reviewer.

It seems clear that our application was denied five points from Quality of Project Services, two points from Evaluation Plan, one point from Commitment and Capacity, two points from Selection of Students, and some part of six points from Quality of Project Design from Reader #3's concerns about gender equity. Thus, our application was denied 16 of 140 points because Reader #3 judged issues of gender as being insufficiently addressed. However, he/she presented no evidence from our application or from any of our publicly available

documents that gender issues were a particular concern in our school district. That is, he/she *assumed* that, absent any positive statement to the contrary, we would discriminate against students of one gender or the other.

2. Factual Errors

Reader 3 made several factual errors in his/her feedback. We say “errors” because the comments from the Reader are directly contradicted by or substantively different from statements made in the grant application. For example:

a) In relation to the greenhouse. Reader #3 states, in the Budget and Resources feedback that *“Clarification is needed to understand how building a greenhouse is going to ensure student development.”* This clarification is given on pages 42, 58, 67, and 68 with specific references to the impact on student development through North Carolina Standard Course of Study connections, student modes of learning, inquiry-based instruction and personal interaction with the natural world.

Reader #3 also states that it *“would be advantageous to allow the students to construct this facility so they can get a clear understanding of the project.”* At two different sections of the application, the application demonstrates efforts towards this very goal: on page 42 the application explains that “Students, in collaboration with the contracted experts, will use the engineering process to help design the outdoor learning space,” and again on page 52 the application describes how “The students will partner with a professional, local landscape architecture and civil engineering firm to learn stewardship skills and create a bird and butterfly habitat, weather station, polar/solar plaza, rock quarry, water garden / frog pond, greenhouse, compost station, and vegetable garden.”

b) In relation to security. Reader #3 states in the Budget and Resources feedback that *“it is inconceivable to hire security guards to protect the work of students.”* In the Need for Assistance feedback, Reader #3 states *“one of the issues raised in the budget analysis and costs for the magnet schools is the purchasing of environmental equipment and hiring security guards to watch over this case.”* It is clear from both the narrative and the actual budget that hiring of security guard personnel was not an activity proposed by us for use of MSAP funds. The issues surrounding the securing of MSAP purchased resources are mentioned in the following three places:

- Pg 42: “security will be installed to protect the investment in the courtyard technology and learning environment.”
- Pg 71” “Upgrading of security safeguards for courtyard to protect investment in outdoor learning”
- Pg 244” “security equipment for the outdoor engineering/science classroom to protect the instructional features added to that exposed area of the campus.”

The terms “installation, “equipment” and “upgrading of security safeguards” do not imply the hiring of personnel; the term “security guard” appears nowhere in the application. If, however, there was still confusion about the nature of this element of the application, a review of the budget would show a clear description of the proposed expense: “Security System for Environmental Engineering & Science Outdoor Classroom/Courtyard: Yr.2 (cameras, monitors, software, motion detectors, photo beams, labor and installation).”

c) In relation to LEGO Robotics. Reader #3 states *“Given the robotics first program, clarification is needed as to how does this speak to ensure access, equity and social justice for all students to perform on the North Carolina End of Grade testing.”* The grant application mentions in a number of places (e.g., page 39, page 65, page 73) utilizing LEGO Robotics to, among other things, encourage “students to focus on movement and programming, requiring them to ask questions, imagine possibilities, plan, design, and improve in accordance with the steps of the Engineering Design Cycle.” Nowhere in the application does the application state an intention to participate in FIRST Robotics, a separate entity from LEGO Robotics. In fact, there are not any FIRST Robotics competitions or programs even available for elementary students in North Carolina. While there may be elementary FIRST Robotics programs in other states, and Reader #3 might be aware of issues related to “access, equity and social justice” connected to these programs, this has no relevance to our application.

Reader #3 ignored supporting information concerning the greenhouse, misread the application’s request for security equipment, and incorrectly associated the proposed program with FIRST Robotics. Factual errors of Reader #3 resulted in denial of two points from Need for Assistance, two points from Budget and Resources,

and some portion of the six points from Quality of Project Design. It is abundantly clear that Reader #3 has misread the application from WCPSS, with a potential impact of 10 points from factual errors.

3. Diversity of Personnel

It is unclear why Reader #3 felt “*very little knowledge concerning diversity of the personnel based on race, age, and ethnicity when it comes to individuals working or supervising this grant*” was provided. In the Quality of Project Personnel section, our application addresses nondiscriminatory employment practices beginning on e6 (page 33) and goes into substantial detail regarding these issues in our General Education Provisions Act (GEPA) statement. Quite an extensive overview is provided that speaks to each of the GEPA Statutes, yet Reader #3 denied 3 points from Quality of Personnel citing that little was said about diversity of personnel.

Conclusion

The issues raised in this letter are not small variations in interpretation from Reader #3, but rather, speak to Reader 3’s significant misunderstanding of the MSAP program’s objectives as well as to factual errors made by Reader 3 as he/she was reading the application from Wake County Public Schools. These errors directly resulted in the denial of 23 of the 28 points Reader #3 deducted from our total, resulting in a score of 112. By contrast, the other two readers awarded 140 points and 129 points.

It is our hope that the US Department of Education will reconsider our application based upon the issues that we have raised. We would, of course, be willing to respond to any additional questions that you might have about our application. We appreciate your timely consideration and look forward to your response.

Sincerely,



Donna M. Hargens, Ed.D.
Interim Superintendent

C: The Honorable Bob Etheridge, U.S. Congressman, 2nd District North Carolina
The Honorable Brad Miller, U.S. Congressman, 13th District North Carolina
The Honorable David Price, U.S. Congressman, 4th District North Carolina
James Shelton, Assistant Deputy Secretary for Innovation and Improvement
Ron Margiotta, Chair, Wake County Board of Education